

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
United States of America

v.

Watson, *et al.*,

Defendants.

Case No. 1:23-cr-00082-EK-1

**[REVISED] MOTION FOR
EXONERATION OF BOND AND
RELEASE OF SURETIES**

Carlos Watson, by and through undersigned counsel, respectfully moves this Court to exonerate the bond previously posted in the above-captioned matter. Mr. Watson received a Presidential Commutation of his entire sentence, inclusive of fines, restitution, probation, and other conditions. In support of this motion, the Defendant states as follows:

On July 16, 2024, Mr. Watson was found guilty of Conspiracy to Commit Securities Fraud (18 U.S.C. § 371, 15 U.S.C. §§ 78j & 78ff), Conspiracy to Commit Wire Fraud (18 U.S.C. §§ 1343, 1349), and Aggravated Identity Theft (18 U.S.C. § 1028A(a)(1), (b)).

The Court released Mr. Watson post-verdict after Mr. Watson posted bail in the amount of three million dollars, secured by the following forms of collateral:

a) VA Family Land located at Gloucester County, Virginia [REDACTED]

[REDACTED] posted by [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] as collateral for the amount of \$750,000.00, and recorded with Gloucester County's Clerk Office on August 5, 2024 [REDACTED]

[REDACTED] and any other lien related to this matter recorded with the Gloucester County's Clerk Office.

b) Condominium located at [REDACTED], posted by [REDACTED] as collateral for the amount of \$100,000.00 (later updated to \$415,000.00), originally recorded with the DC Recorder of Deeds on August 5, 2024 [REDACTED]
[REDACTED]

c) 457(b) plan by One America, posted by [REDACTED] as collateral for the amount of \$130,000.00, under the bail bond with Empire Bonding & Insurance Co.

d) Home located at [REDACTED], posted by [REDACTED] and [REDACTED] as collateral for the amount of \$100,000.00, and recorded with the Hampshire Registry of Deeds on August 5, 2024 [REDACTED]
[REDACTED]

e) \$1,000,000.00 cash posted by [REDACTED] as collateral, which was deposited to the Clerk of Court via a certified check from the Ronald Sullivan Law PLLC trust account.¹

f) Home located at [REDACTED], posted by [REDACTED] as collateral by a Deed of Trust executed on March 10, 2023 [REDACTED]
[REDACTED]

g) Cash (Money Market Account from Truist Bank) posted by [REDACTED] as collateral for the amount of \$12,500.00, under the bail bond with Empire Bonding & Insurance Co.

h) Cash (Money Market Account from Truist Bank) posted by [REDACTED] as collateral for the amount of \$50,000.00, under the bail bond with Empire Bonding & Insurance Co.

i) \$57,876 from TIAA Cref retirement account, \$12,000 from a TIAA CREF mutual fund account, \$23,000 in non-IRA funds from my Ameriprise Investment portfolio, and \$7,124 in cash, posted by [REDACTED] as collateral for the amount of \$100,000.00, under the bail bond with Empire Bonding & Insurance Co.

Additionally, [REDACTED]
underwrote the entirety of the bail package.

¹ Nothing in this document is intended to conflict with ECF 399, which is filed with Mr. Watson's consent.

On March 28, 2025, the President of the United States granted an immediate commutation of Mr. Watson's entire sentence to time served with no further fines, restitution, probation or other conditions for the offenses for which he had been convicted in the above referenced matter. A copy of the official Presidential Pardon, issued by the White House, is attached hereto as Exhibit A.

In light of the Defendant's commutation, the purpose for which the bond was originally set no longer exists, as the Defendant is no longer subject to the original sentence.

WHEREFORE, Mr. Watson respectfully requests that this Court issue an order exonerating the bond in this matter and releasing the sureties of any further obligation under the bond.

Respectfully submitted,

/s/ Ronald Sullivan

Ronald S. Sullivan Jr.

Ronald Sullivan Law PLLC

1300 I Street NW

Suite 400E

Washington, DC 20005

rsullivan@ronaldsullivanlaw.com

(202) 313-8313